

Vote Maria

Chappelle~Nadal

August 26, 2016

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Mary Beth deBeau, Paralegal
999 E Street, NW
Washington, DC 20436

Re: Chappelle-Nadal for Congress
MUR 7106

Dear Ms. deBeau:

This is in response to Assistant General Counsel Jeff Jordan's letter of August 21, 2016, addressed to myself, and the corresponding letter of complaint from Michelle C. Clay dated June 26, 2016, addressed to the FEC.

I believe we previously responded to Mr. Jordan's July 18, 2016, letter and the corresponding letter of complaint from Michelle C. Clay dated June 26, 2016; and to his July 25, 2016, letter enclosing a letter of complaint from Mary Patricia Dorsey dated July 8, 2016. My responses were addressed directly to Mr. Jordan. I now note the request to respond to you instead and do so. If the earlier letters were misdirected and not available to you for that reason, please let me know and I will resend them.

In her June 26, 2016, letter, Ms. Clay provides five paragraphs of factual allegations. None cites any statute or regulation Ms. Clay believes has been violated. None even explains in general terms why Ms. Clay might question the lawfulness of the facts set forth. The entire letter simply states bare-bones factual allegations. It is difficult in such circumstances to respond. Nonetheless, I shall offer brief statements on each paragraph of Ms. Clay's letter.

1. Statewide Candidate Committee

The first paragraph of the letter states that I created a candidate committee "for statewide office for the 2020 primary election, without declaring which specific office is sought." This is expressly permitted under Missouri election law.

RSMo §130.011.1(4) defines "candidate" to include "an individual who seeks nomination or election whether or not the specific elective public office to be sought has been finally determined by such individual at the time" This applies to my statewide candidate status for the 2020 primary.

Maria Chappelle-Nadal
Missouri General Assembly
St. Louis County Democrat

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COUNSEL

A "candidate," as defined by RSMo §130.011.1(4) may form a "Candidate committee" "to receive contributions or make expenditures in behalf of the person's candidacy." RSMo §130.011.1(5). That I have not yet declared for a specific office is simply irrelevant. I have every right to form a general statewide candidate committee.

2. Contributions from State Senate Candidate Committee to State and Local Candidates

The first paragraph of Ms. Clay's letter also states that certain amounts were contributed from my state senate campaign account to candidates on the August 2, 2016, primary ballot, and that some such candidates were outside my state Senate District, but within the first congressional district. Ms. Clay concludes this paragraph by asking: "Do these circumstances rise to the level of avoiding and/or circumventing Federal Election Contribution/Expenditure Rules?" Ms. Clay provides not the slightest clue as to why she may believe the answer is "yes." In fact, the answer is an unequivocal "no."

Under RSMo § 130.034.2(5), contributions to support a candidate for state or local office may be used to contribute to another candidate's campaign committee, which is what is described. Ms. Clay cites no statute or law that would limit such contributions geographically in any manner.

3. Reimbursement to Sandy Tsai

The second paragraph of Ms. Clay's letter refers to a reimbursement to Sandy Tsai of \$14,000 from my state campaign committee account, stating that "seemingly...appears to be "an inappropriate transfer of funds." Again, I am left guessing as to what Ms. Clay speculates might be unlawful here.

In fact, this reimbursement to Sandy Tsai was in full compliance with all applicable law. It was of a \$14,000 contribution made by this donor and duly reported to the Missouri Ethics Commission ("MEC") in 2013. The reimbursement was at the request of this donor.

See RSMo § 130.034.2 (purposes for which contributions may be used include "The return of any contribution to the person who made the contribution to the candidate or holder of elective office").

4. Contribution by State Senate Candidate Committee to Congressional Committee

The third paragraph of Ms. Clay's letter refers to a \$1,000 contribution by my state senate candidate committee to my congressional committee that was not included in that committee's January 31 and April 15 FEC reports.

This amount was properly omitted from FEC reporting because it was never actually donated. After the check was prepared, and after the MEC year-end report was filed, but before the check was deposited, it was determined that this should not be done, and the check was voided and destroyed. Accordingly, an amended year-end report was filed with the MEC removing this

contribution. By the time the FEC filings were prepared, this \$1,000 amount was moot, having never actually come to fruition as a reportable donation.

5. Expenditure to Local Politech Strategies and Lack of FEC Reporting of Congressional Campaign Website Expenditures

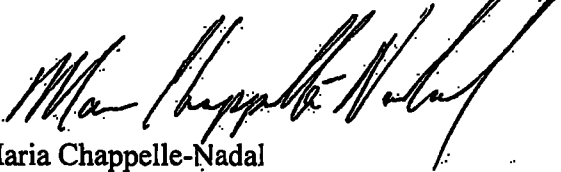
The fourth paragraph of Ms. Clay's letter refers to a \$508 expenditure to Local Politech Strategies for data maintenance and website hosting reported to the MEC, and to congressional campaign website, Facebook and Twitter accounts. These facts do not establish any violation of law.

This expenditure was made for purposes lawful for the use of state campaign committee funds, not for the congressional campaign, and it was properly reported as such in full compliance with the law. See RSMo § 130.034.2(2) which makes lawful "ordinary and necessary expenses incurred in connection with the duties of a holder of elective office."

This expenditure was for a website, "Eyes on Ferguson," that I created and maintained as a service to constituents for some time following the unrest in Ferguson, which is within my state senatorial district. The website has since been taken down, and the payment in question was final payment for it.

This expenditure was not for my congressional campaign website, and it therefore need not be reported to the FEC. That website is being provided at no cost by the Progressive Change Campaign Committee ("PCCC"). It is, therefore, an in-kind donation to the congressional campaign, and it will be duly and properly reported as such at the appropriate time.

I trust this answers any questions concerning compliance with applicable election law by Citizens for Maria Chappelle-Nadal or Chappelle-Nadal for Congress that may have been raised by Ms. Clay's letter.


Maria Chappelle-Nadal

ENCLOSURE



Local Politechs Strategies
3430 Connecticut Avenue, NW #11941
Washington, DC 20008

(202)713-5746
billing@localpolitechs.com
http://www.localpolitechs.com/

Invoice

BILL TO
Maria Chappelle-Nadal
CITIZENS FOR MARIA CHAPPI

University City, MO 63130

INVOICE # 1381
TERMS Due on receipt
DATE 09/16/2015
DUE DATE 09/16/2015

AMOUNT DUE
\$508.20

ENCLOSED

Please detach top portion and return with your payment,
X

ACTIVITY	QUANTITY	RATE	AMOUNT
• September 2014 EyesOnFerguson NationBuilder hosting			36.30
• October EyesOnFerguson NationBuilder hosting			36.30
• November 2014 EyesOnFerguson NationBuilder hosting			36.30
• December 2014 EyesOnFerguson NationBuilder hosting			36.30
• January 2015 EyesOnFerguson NationBuilder hosting			36.30
• February 2015 EyesOnFerguson NationBuilder hosting			36.30
• March 2015 EyesOnFerguson NationBuilder hosting			36.30
• April 2015 EyesOnFerguson NationBuilder hosting			36.30
• May 2015 EyesOnFerguson NationBuilder hosting			36.30

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RADIOACTIVE WASTE:

Toxic Waste Dumped Across St. Louis County



St. Louis Residents,

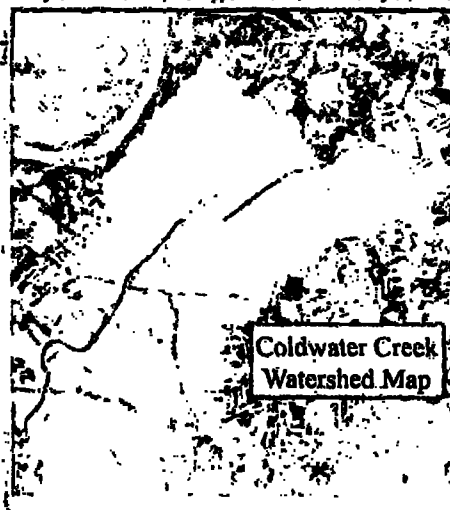
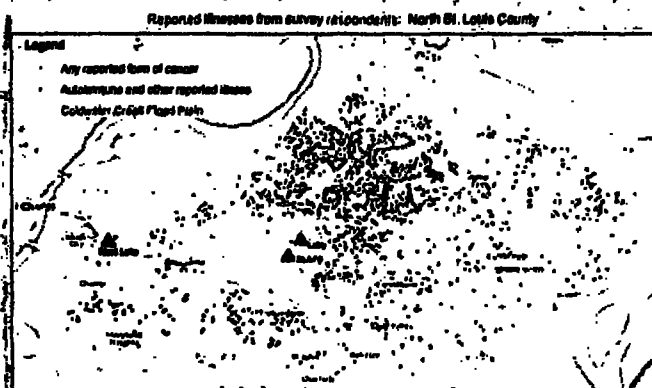
Over the last year, I've discussed at length the public health crisis posed by radioactive waste contamination at the Bridgeton landfills and along Coldwater Creek. The waste is toxic, and can cause severe health issues. Even more alarming is an underground fire burning near the area at an adjacent landfill, closer to the waste than was previously thought.

The EPA has been slow to take action. Meanwhile, individuals are dying from cancer and other radiation-exposure related illness. It's time for the federal government to take responsibility and remedy this extremely hazardous situation.

I encourage everyone to contact their local, state and federal representatives and demand action. Educate yourself on this issue. We cannot let government continue to fail our community.

Senator Maria Chappelle-Nadal

Paid for by Citizens for Maria Chappelle-Nadal, Neva A. Taylor, Treasurer



- Cancer clusters and autoimmune diseases have increased dramatically in our region
- Enriched uranium contaminates neighborhoods, schools and parks throughout the St. Louis area.